

#### United States

#### Environmental Protection Agency Washington, DC 20460

#### Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address Oro Agri, Inc	EPA File Symbol/Registration Number 72662-3
2788 S. Maple Ave Fresno, CA 93725	Product Name PREV-AM ULTRA
	Date of Confidential Statement of Formula (EPA Form 8570-4) 02/09/2016 (notification to revise CSF pending)

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Sodium Tetraborohydrate Decahydrate

- (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).
- (3) Indicate by checking (A) or (B) below which paragraph applies:
- (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

  That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

- (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.
- (4) The following active ingredients in this product qualify for the formulator's exemption.

Source							
Active Ingredient	Product Name	Registration ( lumber					
Sodium Tetraborohydrate							
Decahydrate							
	j						
Signature	Name and Title	Date					
Some M. Toal	Anne Turnbough	02/10/2017					
EPA Form 8570-27 (Rev. 06-2004)		Copy 1 – EPA					

Copy 1 – EPA Copy 2 - Applicant copy



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

to this address.	13	
Certification with Respect to C	Citation of Data	
Applicant's/Registrant's Name, Address, and Telephone Number ORO AGRI, Inc / 2788 S. Maple Ave Fresno, CA 93725 / (559)442-4996	EPA Registration Number/File Symbol 72662-3	
Active Ingredient(s) and/or representative test compound(s) Sodium Tetraborohydrate Decahydrate		Date February 10, 2017
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Terrestrial Crop	)	Product Name PREV-AM ULTRA
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Formulator's Exemption Statement)	ed product labeled for 8570-27).	or all the same uses on your label, you do not need to
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should
SECTION I: METHOD OF DATA SUPP	ORT (Check one m	ethod only)
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	under the	g the selective method of support (or cite-all option selective method), and have included with this form a d list of data requirements (the Data Matrix form must be
SECTION II: GENERAL (	OFFER TO PAY	
[Required if using the cite-all method or when using the cite-all option under the select liberally offer and agree to pay compensation, to other persons, with regard to		- Total level of the section of the
SECTION III: CERTI	FICATION	
I certify that this application for registration, this form for reregistration, or the application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) is requirements in effect on the date of approval of this application if the application souguses.	addition, if the cite- (1) concern the pro s a type of data that	all option or cite-all option under the selective method is perties or effects of this product or an identical or would be required to be submitted under the data
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, the	at I am the original data submitter or that I have obtained
I certify that for each study cited in support of this registration or reregistration submitter; (b) I have obtained the permission of the original data submitter to use the submitter; (b) I have obtained the permission of the original data submitter to use the submitter; (c) I have expired for the study; (d) the study is in the public literature; or (e) offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(d) amount and terms of compensation, if any, to be paid for the use of the study.	study in support of the have notified in wri	nis application; (c) all periods of eligibility for ting the company that submitted the study and have
I certify that in all instances where an offer of compensation is required, cop accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be evidence to the Agency upon request, I understand that the Agency may initiate action FIFRA.	e submitted to the	Agency upon request. Should I fail to produce such
I certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or imprisor		
Signature C	Date	Typed or Printed Name and Title
Some M. Tugl	Feb 10, 2017	Anne Turnbough Director of Regulatory Affairs

Form Approx

Form Approved OMB No. 2070-0060

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	DATA M	IATRIX			
Date February 10, 2017			EPA Reg No./File Symbol 72662-	-3	Page 1 of 7
Applicant's/Registrant's Name & Add	ress ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725		Product PREV-AM ULTRA		
Ingredient Sodium Tetraborohy	drate Decahydrate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Rec	uirements				
Product Chemistry					
830.1550	Product Identity and Composition	45924501	ORO Agri, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	45924501	ORO Agri, Inc.	OWN	
830.1620	Description of Production Process				Not required <sup>1</sup>
830.1650	Description of Formulation Process	45924501	ORO Agri, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	45924501	ORO Agri, Inc.	OWN	
830.1700	Preliminary Analysis				Not required <sup>2</sup>
830.1750	Certified Limits	45924501	ORO Agri, Inc.	OWN	
830.1800	Enforcement Analytical Method	45924501	ORO Agri, Inc.	OWN	
830.6302	Color				Not required <sup>3</sup>
830.6303	Physical State	See 72662-3 (self certification)	ORO Agri, Inc.	OWN	
830.6304	Odor				Not required <sup>3</sup>
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required <sup>3</sup>
830.6314	Oxidation/Reduction: Chemical Incompatibility	See 72662-3 (self certification)	ORO Agri, Inc.	OWN	
Signature	A=1		Name and Title		Date
Stime M	. Tuyl		Anne Turnbough, Director of Re	gulatory Affairs	February 10, 2017

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W.

WASHINGTON, D.C. 20460

		DATA MATRIX			
Date February 10, 2017			EPA Reg No./File Symbol 7266	2-3	Page 1 of 7
Applicant's/Registrant's Name & Address  ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725		Product PREV-AM ULTRA			
ngredient Sodium Tetraboroh	ydrate Decahydrate				_
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			000 4 4 4		
			ORO Agri, Inc.	OWN	
			ORO Agri, Inc.	OWN	
					Not required
			ORO Agri, Inc.	OWN	
			ORO Agri, Inc.	OWN	
					Not required
			ORO Agri, Inc.	OWN	
			ORO Agri, Inc.	OWN	
					Not required
			ORO Agri, Inc.	OWN	
					Not required
					Not required
			ORO Agri, Inc.	OWN	1
Signature		Tarana di mangana di Jamasa di Manda di	Name and Title		Date
Aune M	. Turyl		Anne Tumbough, Director of	Regulatory Affairs	February 10, 201

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WASHINGTON, D.C. 20460

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Date February 10, 2017			EPA Reg No./File Symbol 72662-3		Page 2 of 7
Applicant's/Registrant's Name & Address  ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725			Product PREV-AM ULTRA		
Ingredient Sodium Tetraborohy	ydrate Decahydrate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6315	Flammability				Not required <sup>4</sup>
830.6316	Explodability				Not required <sup>5</sup>
830.6317	Storage Stability				PRN 92-5 <sup>6</sup>
830.6319	Miscibility				Not required <sup>7</sup>
830.6320	Corrosion Characteristics				See endnote <sup>6</sup>
830.6321	Dielectric Breakdown Voltage				Not required <sup>8</sup>
830.7000	рН	See 72662-3 (self certification)	ORO Agri, Inc.	OWN	
830.7050	UV/Visible Absorption				Not required <sup>3</sup>
830.7100	Viscosity	See 72662-3 (self certification)	ORO Agri, Inc.	OWN	
830.7200	Melting Point/Melting Range				Not required <sup>3</sup>
830.7220	Boiling Point/Boiling Range				Not required <sup>3</sup>
830.7300	Density/Relative Density/Bulk Density	See 72662-3 (self certification)	ORO Agri, Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required <sup>3</sup>
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required <sup>3</sup>
ignature Name and Title					Date February 10, 2017

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		DATA MATRIX		1115071 = 007		
Date February 10, 2017			EPA Reg No./File Symbol 726	62-3	Page 2 of 7	
Applicant's/Registrant's Name & Address ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725		Product PREV-AM UL				
Ingredient Sodium Tetraboroh						
Guideline Reference Number	Guidefine Study Name	MRID Number	Submitter	Status	Note	
					Not required <sup>4</sup>	
					Not required <sup>5</sup>	
					PRN 92-56	
					Not required7	
					See endnote <sup>6</sup>	
					Not required <sup>8</sup>	
			ORO Agri, Inc.	OWN		
					Not required <sup>3</sup>	
			ORO Agri, Inc.	OWN		
					Not required <sup>3</sup>	
					Not required <sup>3</sup>	
			ORO Agri, Inc.	OWN	J 1000 -	
					Not required <sup>3</sup>	
					Not required <sup>3</sup>	
Signature  Name and Title  Anne Turnbough, Director of Regulatory Affairs				Date February 10, 2017		

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Date February 10, 2017			EPA Reg No./File Symbol 720	662-3	Page 3 of 7
Applicant's/Registrant's Name & Address  ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725			Product PREV-AM ULTRA		
Ingredient Sodium Tetraboroh	ydrate Decahydrate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required <sup>3</sup>
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required <sup>3</sup>
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required <sup>3</sup>
830.7860	Water Solubility, Generator Column Method				Not required <sup>3</sup>
830.7950	Vapor Pressure				Not required <sup>3</sup>
Acute Toxicity					
870.1100	Acute Oral Toxicity: Rat	45276502	ORO Agri, Inc.	OWN	
870.1200	Acute Dermal Toxicity: Rat	45276503	ORO Agri, Inc.	OWN	
870.1300	Acute Inhalation Toxicity: Rat	45075503	ORO Agri, Inc.	OWN	
870.2400	Primary Eye Irritation: Rabbit	45276504	ORO Agri, Inc.	OWN	
870.2500	Primary Dermal Irritation	45276505	ORO Agri, Inc.	OWN	
870.2600	Dermal Sensitization	45075506	ORO Agri, Inc.	OWN	
81-4	Primary Eye Irritation	50110001	U.S Borax	PER	
Signature W	. Times C		Name and Title Anne Turnbough, Director of	of Regulatory Affairs	Date February 10, 2017

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send the form to this address.						
		DATA MATRIX				
Date February 10, 2017			EPA Reg No./File Symbol 72662	2-3	Page 3 of 7	
Applicant's/Registrant's Name & Address ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725		Product PREV-AM ULTI				
ngredient Sodium Tetraborohy				<u> </u>		
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
			2002 2004 2002		Not required <sup>3</sup>	
					Not required <sup>3</sup>	
					Not required <sup>3</sup>	
					Not required <sup>3</sup>	
					Not required <sup>3</sup>	
			ORO Agri, Inc.	OWN		
			ORO Agri, Inc.	OWN	<del> </del>	
			ORO Agri, Inc.	OWN		
			ORO Agri, Inc.	OWN		
			ORO Agri, Inc.	OWN		
			ORO Agri, Inc.	OWN		
			U.S Borax	PER		
Signature			Name and Title		Date	
Anne M	1. Turne	4	Anne Tumbough, Director of R	Regulatory Affairs	February 10, 2017	

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Date February 10, 2017			EPA Reg No./File Symbol 72662-3		Page 4 of 7
Applicant's/Registrant's Name & Address  ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725			Product PREV-AM ULTRA		
Ingredient Sodium Tetraborol	hydrate Decahydrate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Sodium Tetraborohydrat	e Decahydrate Generic Data Requirements				
<b>Ecotoxicity Data Require</b>	ements				
71-1(a)	Acute Avian Oral Toxicity: Quail or Duck	00100657		OLD	
		GS0024-017		OLD	
71-2(a)	Acute Avian Dietary Toxicity: Quail	00141770		OLD	
		GS0024-018		OLD	
		GS0024-019		OLD	
71-2(b)	Acute Avian Dietary Toxicity: Duck	00141771		OLD	
57.0		GS0024-020		OLD	
		GS0024-021		OLD	
71-3	Wild Mammal Toxicity				Not Required
71-4(a)	Avian Reproductive Toxicity: Quail				Waiver <sup>10</sup>
71-4(b)	Avian Reproductive Toxicity: Duck				Waiver <sup>11</sup>
72-1(a),(b)	Fish Toxicity: Bluegill	40594601		OLD	
72-1(c),(d)	Fish Toxicity: Trout	46955801		OWN	
		00090307		OLD	
		40594602		OLD	
		GS0024-022		OLD	
Signature A			Name and Title		Date
Anne M	1. Turne		Anne Turnbough, Director of Regu	latory Affairs	February 10, 2017

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W.

WASHINGTON, D.C. 20460

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Date February 10, 2017			EPA Reg No /File Symbol 72662-3	EPA Reg No./File Symbol 72662-3		
Applicant's/Registrant's Name & Address  ORO Agri, Inc.  2788 S. Maple Ave Fresno, Ca 93725		Product PREV-AM ULTRA				
Ingredient Sodium Tetraborohy	ydrate Decahydrate					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
				OLD		
				OLD		
				OLD		
				OLD	1	
				OLD		
				OLD		
				OLD		
				OLD		
					Not Required	
					Waiver <sup>10</sup>	
					Waiver <sup>11</sup>	
				OLD		
				OWN		
				OLD	1	
				OLD		
				OLD		
Signature ,			Name and Title		Date	
	1. Tury		Anne Tumbough, Director of Regu	ulatory Affairs	February 10, 2017	

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Form Approved OMB No. 2070-0060

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Date February 10, 2017 Applicant's/Registrant's Name & Address ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725		EPA Reg No./File Symbol 72662-3		Page 5 of 7	
			Product PREV-AM ULTRA		
Ingredient Sodium Tetraboroh	nydrate Decahydrate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
72-2(a)(b)	Freshwater Invertebrate Toxicity	46955801 GS0024-023		OWN OLD	
72-3(a)	Estuarine/Marine Fish Toxicity				Waiver <sup>12</sup>
72-3(b)	Estuarine/Marine Mollusk Toxicity				Waiver <sup>13</sup>
72-3(c)	Estuarine/Marine Shrimp Toxicity				Waiver <sup>14</sup>
72-4(a)	Early Life Stage: Fish				Waiver <sup>15</sup>
72-4(b)	Early Life Stage: Aquatic Invertebrate				Waiver <sup>16</sup>
72-5	Life Cycle Fish				Waiver <sup>17</sup>
Plant Protection Data Re	quirements				
122-1(a)	Tier 1: Seed Germination and Seedling Emergence	46955802		OWN	
122-1(b)	Tier 1: Vegetative Vigor	46955802		OWN	
122-2	Tier 1: Aquatic Plant Growth	46955801		OWN	
		46955802			
Nontarget Insect Data Re	equirements				
141-1	Acute Contact Toxicity: Honey Bee	00060632		OLD	
		46955803 46955804		OWN	
Signature Anne M. Tupyl		***************************************	Name and Title Anne Turnbough, Director of Regulatory Affairs		Date February 10, 201

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		Product PREV-AM ULTRA			
ngredient Sodium Tetraboroh	ydrate Decahydrate				
Guideline Reference Number Guideline Study Name		MRID Number	MRID Number Submitter	Status	Note
				OWN	
				OLD	
					Waiver <sup>12</sup>
					Waiver <sup>13</sup>
					Waiver <sup>14</sup>
					Waiver <sup>15</sup>
					Waiver <sup>16</sup>
					Waiver <sup>17</sup>
				OWN	
				OWN	
				OWN	
				OLD	
				OWN	
Signature Anne M	T. 0.		Name and Title Anne Turnbough, Director of Regulatory Affairs		Date February 10, 201

Form Appro

Form Approved OMB No. 2070-0060

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			Product PREV-AM ULTRA		
Ingredient Sodium Tetraboroh	ydrate Decahydrate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Environmental Fate Data	Requirements				
161-1	Hydrolysis	46955805		OWN	
161-2	Photodegradation in Water	46955805		OWN	
161-3	Photodegradation in Soil	46955805		OWN	
162-1	Aerobic Soil Metabolism	46986401		OWN	
162-2	Anaerobic Soil Metabolism	46955805		OWN	
162-3	Anaerobic Aquatic Metabolism				Not required 18
162-4	Aerobic Aquatic Metabolism				Not required 19
163-1	Leaching and Adsorption/Desorption	05008133		OLD	
164-1	Soil Field Dissipation Study	46955805		OWN	
164-2	Aquatic Sediment Field Dissipation Study				Not required <sup>20</sup>
164-3	Forest Field Dissipation Study				Not required <sup>21</sup>
164-5	Long Term Field Dissipation Study	46955805		OWN	
165-1	Confined Crop Rotation Study	46955805		OWN	
165-3	Accumulation - Irrigated Crops				Not required <sup>22</sup>
165-4	Accumulation in Fish	46955805		OWN	
Signature Anne M. Turnyl			Name and Title Anne Turnbough, Director of Re	egulatory Affairs	Date February 10, 2017

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			Product PREV-AM ULT		
Ingredient Sodium Tetraborohy	/drate Decahydrate				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
				OWN	
			A	OWN	
					Not required 18
					Not required 19
				OLD	
				OWN	
					Not required <sup>20</sup>
					Not required <sup>21</sup>
				OWN	
				OWN	
					Not required <sup>22</sup>
				OWN	
Signature Anne M.	Tuend		Name and Title Anne Turnbough, Director of Regulatory Affairs		Date February 10, 2017

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	DATA M	ATRIX				
Date February 10, 2017			EPA Reg No /File Symbol 72662-3		Page 7 of 7	
Applicant's/Registrant's Name & Address ORO Agri, Inc. 2788 S. Maple Ave Fresno, Ca 93725			Product PREV-AM ULTRA			
Ingredient Sodium Tetraboroh	ydrate Decahydrate					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
860.1500 (171-4(k))	Magnitude of the Residue in Plants: Papaya	N/A		N/A	See endnote <sup>23</sup>	
860.1500 (171-4(k))	Magnitude of the Residue in Plants: Parsley	N/A		N/A	See endnote <sup>23</sup>	
860.1500 (171-4(k))	Magnitude of the Residue in Plants: Pineapple	N/A		N/A	See endnote <sup>23</sup>	
860.1500 (171-4(k))	Magnitude of the Residue in Plants: Rosemary	N/A		N/A	See endnote <sup>23</sup>	
860.1500 (171-4(k))	Magnitude of the Residue in Plants: Soybean	N/A		N/A	See endnote <sup>23</sup>	
860.1500 (171-4(k))	Magnitude of the Residue in Plants: Watercress	N/A		N/A	See endnote <sup>23</sup>	
860.1520 (171-4(1))	Magnitude of Residue: Processed Food/Feed Citrus Fruits Group	N/A		N/A	See endnote <sup>24</sup>	
860.1520 (171-4(1))	Magnitude of Residue: Processed Food/Feed – Basil	N/A		N/A	See endnote <sup>24</sup>	
860.1520 (171-4(1))	Magnitude of Residue: Processed Food/Feed – Cacao	N/A		N/A	See endnote24	
860.1520 (171-4(1))	Magnitude of Residue: Processed Food/Feed – Coffee	N/A		N/A	See endnote <sup>24</sup>	
860.1520 (171-4(1))	Magnitude of Residue: Processed Food/Feed – Com (Field, Popcorn, Silage, Sweet)	N/A		N/A	See endnote <sup>24</sup>	
860.1520 (171-4(1))	Magnitude of Residue: Processed Food/Feed – Oregano	N/A		N/A	See endnote24	
Signature Anne M. Tuenel			Name and Title Anne Turnbough, Director of Re	egulatory Affairs	Date February 10, 2017	

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		Product PREV-AM ULTRA			
Ingredient Sodium Tetraborohy	ydrate Decahydrate				
Guideline Reference Number Guideline Study Name		MRID Number	Submitter	Status	Note
				N/A	See endnote23
				N/A	See endnote <sup>23</sup>
				N/A	See endnote <sup>23</sup>
				N/A	See endnote25
				N/A	See endnote2
				N/A	See endnote <sup>23</sup>
				N/A	See endnote <sup>24</sup>
				N/A	See endnote <sup>2</sup>
				N/A	See endnote <sup>2</sup>
				N/A	See endnote <sup>2</sup>
				N/A	See endnote <sup>2</sup>
				N/A	See endnote <sup>2</sup>
Signature M	. Triangl		Name and Title Anne Turnbough, Director of Regulatory Affairs		Date February 10, 2017

#### **Endnotes for Data Matrix for PREV-AM**

- <sup>3</sup> 830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950 Per OPPTS 830.1000, these data are not required for the registration of a end-use product.
- 4 830.6315 This product is not a combustible liquid; therefore these data are not applicable to this enduse product. Please refer to the Confidential Statement of Formula for additional information on the composition of PREV-AM Ultra.
- 5 830.6316 This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of PREV-AM Ultra.
- <sup>6</sup> 830.6317, 830.6320 ORO Agri, Inc. is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively. Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously.
- <sup>7</sup> 830.6319 PREV-AM Ultra is a water based formulation and not an emulsifiable concentrate. In addition, the proposed label recommends dilution of PREV-AM Ultra with water, not oil; therefore, these data are not applicable nor are these data required.
- 8 830.6321 This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these required.
- <sup>9</sup> 71-3 These data are not required. Disodium octaborate tetrahydrate has a relatively low acute toxicity to mammals (with the exception of eye irritation). In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact wild mammals and these data are not required.
- 10 71-4(a) Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to avian species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact avian species and these data are not required.
- 71-4(b) Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to avian species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact avian species and these data are not required.
- 72-3(a) Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to freshwater species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact marine species and these data are not required.
- 72-3(b) Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to freshwater species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact marine species and these data are not required.
- 14 72-3(c) Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to freshwater species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact marine species and these data are not required.

<sup>1 830.1620 -</sup> Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.

<sup>&</sup>lt;sup>2</sup> 830.1700 – This product does not consist solely of the technical grade active ingredient (TGAI) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.

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- 15 72-4(a) Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to freshwater species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact marine species and these data are not required.
- 16 72-4(b) Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to freshwater species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact marine species and these data are not required.
- 17 72-5 Oro Agri respectfully requests a waiver for this data requirement. Disodium octaborate tetrahydrate is practically nontoxic to freshwater species. In addition, it is naturally occurring and used widely in nonpesticide applications. As such, DOT is not expected to significantly impact marine species and these data are not required.
- 18 162-3 Prev-Am is not proposed for use in/on aquatic use sites. Therefore, these data are not required.
- 19 162-4 Prev-Am is not proposed for use in/on aquatic use sites. Therefore, these data are not required.
- 20 164-2 Prev-Am is not proposed for use in/on aquatic use sites. Therefore, these data are not required.
- 21 164-3 Prev-Am is not proposed for use in/on forestry use sites. Therefore, these data are not required.
- 22 164-2 Prev-Am is not proposed for use in/on aquatic use sites. Therefore, these data are not required.
- <sup>23</sup> 860.1500 (174-4(k)) According to 40 CFR 180.1121, boric acid and its salts are exempt from the requirement of a tolerance in or on raw agricultural commodities when used as an active ingredient in insecticides, herbicides, or fungicides preharvest or postharvest in accordance with good agricultural practices. Therefore, these data are not applicable, nor are they required.
- <sup>24</sup> 860.1520 (174-4(I)) According to 40 CFR 180.1121 boric acid and its salts are exempt from the requirement of a tolerance in or on raw agricultural commodities when used as an active ingredient in insecticides, herbicides, or fungicides preharvest or postharvest in accordance with good agricultural practices. Therefore, these data are not applicable, nor are they required.

